## BEFORE THE JUDICIAL PANEL ON MULTIDISTRICT LITIGATION

IN RE: ASBESTOS PRODUCTS LIABILITY LITIGATION (NO. VI)

MDL DOCKET NO. 875

## NOTICE OF POTENTIAL TAG ALONG ACTION PURSUANT TO J.P.M.L. RULE 7.2(i)

Now into court comes Elisa Gilbert, Esq., counsel for the defendant, Northrop Grumman Systems Corporation ("NGSC"), in the case of "Miranda vs. Northrop Grumman System Corp., et al." Docket No. 08 CV 5491, U.S. District Court, Southern District of New York, for the purpose of submitting this Notice of Potential Tag Along Action, and says as follows:

- 1. Pursuant to J.P.M.L. Rule 7.2(i), counsel hereby notifies the panel and all counsel that the undersigned counsel feels that the aforementioned action, "Miranda vs. Northrop Grumman System Corp., et al." Docket No. 08 CV 4803, U.S. District Court, Southern District of New York, may be a potential tag along action in "In Re: Asbestos Products Liability Litigation (No. VI)" MDL No. 875.
  - 2. Counsel hereto attaches proof of service on all parties to this action.

Wherefore, counsel, Elisa Gilbert, Esq., prays this Notice of Potential Tag Along Action be deemed good and sufficient.

This 23rd day of June, 2008

Respectfully submitted,

THE GILBERT FIRM, LLC Attorneys for Defendant

By:

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## AFFIDAVIT OF SERVICE BY ELECTRONIC FILING

STATE OF NEW YORK

)ss.:

**COUNTY OF NEW YORK)** 

I, Adam Blockton, being duly sworn deposes and says:

I am not a party to the action, am over 18 years of age and reside in New York, New York.

On June 23, 2008, I served the within NOTICE OF POTENTIAL TAG ALONG ACTION PURSUANT TO J.P.M.L. RULE 7.2 (i) by electronic filing addressed to each of the following persons.

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TRIAD INTERNATIONAL MAINTENANCE CORPORATION

RHEACO, INC.

**UNISYS CORPORATION** 

ROLLS ROYCE CORPORATION C/O CORPORATION SERVICE COMPANY

Adam Blockton

Sworn to before me on this 23rd day of June, 2008

Notary Public

ELISA T. GILBERT
Notary Public, State of New York
No. 02GI5042582
Qualified in New York County
Commission Expires

8/12/2010